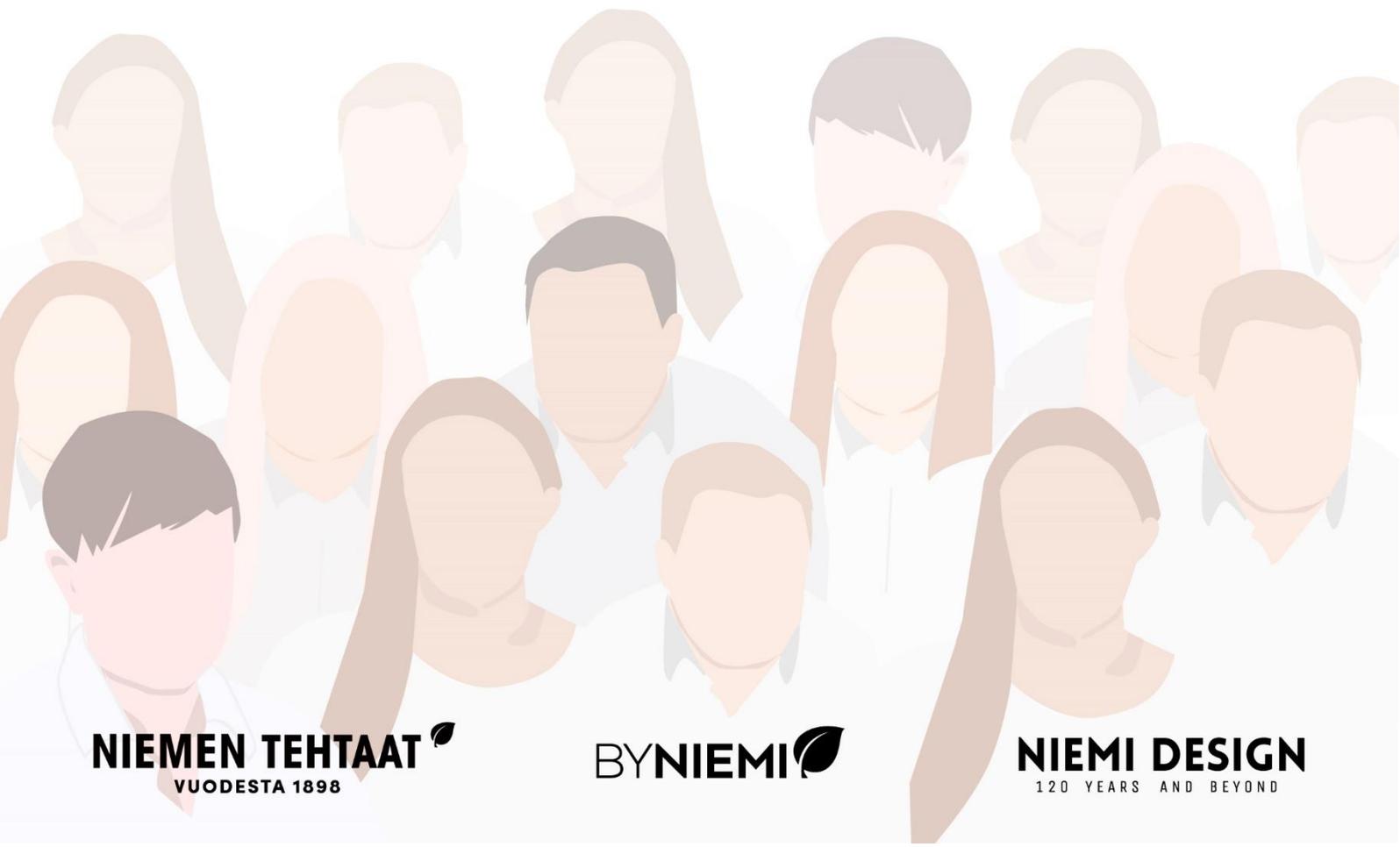


# NIEMEN TEHTAAT OY

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## CODE OF CONDUCT



# NIEMEN TEHTAAT OY CODE OF CONDUCT

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This Code of Conduct describes the main principles that Niemen Tehtaat Oy complies with concerning company's defined set of rules, principles, values, employee expectations, behaviors, and relationships that a company and its leadership considers important. This Code of Conduct also describes expectations to the supplier of the company.

# TABLE OF CONTENTS

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GENERAL	4
LABOUR STANDARDS AND HUMAN RIGHTS	5
ENVIRONMENTAL RESPONSIBILITY	6
HEALTH AND SAFETY	7
PRODUCT QUALITY AND SAFETY	8
REQUIREMENTS FOR SUPPLIERS	9

REQUIREMENTS CONCERNING HEALTH AND SAFETY

REQUIREMENTS CONCERNING LABOUR STANDARDS AND HUMAN RIGHTS

REQUIREMENTS CONCERNING BUSINESS ETHICS

REQUIREMENTS CONCERNING ENVIRONMENT

REQUIREMENTS CONCERNING CHEMICALS IN PRODUCTS AND PRODUCTION

REQUIREMENTS CONCERNING PRODUCT SAFETY

IN THE EVENT OF A BREACH OF THE CODE OF CONDUCT

# GENERAL

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Niemen Tehtaat Oy complies with all national and international foreign trade control laws applicable to their business activities, including but not limited to export controls, trade embargoes, and other prohibitions or restrictive measures imposed by the United Nations, the European Union, the United Kingdom and the United States (“Trade Control Laws”).

Niemen Tehtaat Oy complies with all national and international labour legislation.

# LABOUR STANDARDS AND HUMAN RIGHTS

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Niemen Tehtaat Oy complies with all national and international labour legislation. Finnish national labour legislation comprises such acts as the Employment Contracts Act, the Working Time Act, the Annual Holidays Act, the Non-discrimination Act, the Act on the Protection of Privacy in Working Life, the Collective Agreements Act, the Act on Job Alternation Leave (partially within the purview of the Ministry of Social Affairs and Health, MSAH), the Study Leave Act, the Wage Guarantee Act and the legislation on the personnel involvement systems (co-operation within undertakings, representation in administrative organs and personnel funds).

The Ministry of Economic Affairs and Employment is responsible for drafting and evolving labour legislation. All the legislation is to be found in free website maintained by Finnish government.

# ENVIRONMENTAL RESPONSIBILITY

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Niemen Tehtaat Oy complies with the Finnish Environmental Protection Legislation. [527/2014 - Säädömuutosten hakemisto - FINLEX®](#)

Niemen Tehtaat Oy has adopted an environmental policy as well as processes to manage environmental aspects and reduce or minimize negative environmental impacts. Furthermore, Niemen Tehtaat Oy has encouraged their own suppliers to reduce environmental impacts.

Niemen Tehtaat Oy has implemented its own DDS-system (Due Diligence System) concerning materials from imported from the outside of EU. DDS-system is obligatory when placed timber or timber products on the EU market. Niemen Tehtaat Oy DDS-system has been approved by Finnish Food Authority.

Niemen Tehtaat Oy reduce its own energy usage by using solar energy from its own solar energy plant, and thus reduces its greenhouse gas emissions.

Niemen Tehtaat Oy fulfills all the requirements in the REACH Regulations. In Finland REACH regulation is overseen by Government Agency Tukes.

One of the company's strategic goals is to continuously improve its ESG sustainability.

# HEALTH AND SAFETY

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Niemen Tehtaat Oy ensure that employees working in company operations are be offered a safe and healthy work environment in which preventive measures are taken to reduce injury and risks to health. A safe and hygienic working environment is one in which the employee, when occupying an area over which the employer has direct or indirect control, is guaranteed to be free from or protected from conditions that can constitute a hazard for the employee's physical and/or psychological health. All workers have health and safety training on a regular basis.

All workplaces have sufficient first aid kits and persons trained in basic first aid. There shall be routines for handling serious injuries requiring outside medical attention and have a sufficient number of exits for an emergency, and these shall remain unlocked and free from obstruction in case of a fire or other emergency situation.

All the machines have satisfactory and functional safety devices which shall be maintained on a regular basis. The lighting is always sufficient so as to ensure a safe working environment.

Niemen Tehtaat Oy works to prevent harsh or inhumane treatment, including bullying and physical or mental harassment, mental or physical abuse, coercion, detention, or punishment. Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

# PRODUCT QUALITY AND SAFETY

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Niemen Tehtaat Oy ensure that products meet agreed and legal standards for health and safety, and that products are properly labelled and have instructions for safe use.

It also continuously considers the health and safety effects of their products and services over their live cycle.

# REQUIREMENTS FOR SUPPLIERS

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Niemen Tehtaat Oy impose requirements on its suppliers.

General requirements for suppliers:

Suppliers are to be aware and comply with all applicable laws and regulations on international, regional, and national levels. This includes international conventions concerning human rights and labour rights, protection of the environment, as well as anti-corruption and competition law.

Suppliers are to comply with all national and international foreign trade control laws applicable to their business activities, including but not limited to export controls, trade embargoes, and other prohibitions or restrictive measures imposed by the United Nations, the European Union, the United Kingdom, and the United States (“Trade Control Laws”).

## REQUIREMENTS CONCERNING HEALTH AND SAFETY

Supplier must:

Ensure that employees working in company operations are be offered a safe and healthy work environment in which preventive measures are taken to reduce injury and risks to health. A safe and hygienic working environment is one in which the employee, when occupying an area over which the employer has direct or indirect control, is guaranteed to be free from or protected from conditions that can constitute a hazard for the employee’s physical and/or psychological health.

Ensure that workers, including temporary and contracted workers, perform their duties with respect to safety norms.

Have a system for identifying and assessing health hazards and work to eliminate the root causes of accidents in the workplace.

Ensure, that all the workplaces shall have sufficient first aid kits and persons trained in basic first aid. There shall be routines for handling serious injuries requiring outside medical attention.

Ensure, the all the workplaces shall have a sufficient number of exits for an emergency, and these shall remain unlocked and free from obstruction in case of a fire or other emergency situation.

## REQUIREMENTS CONCERNING LABOUR STANDARDS AND HUMAN RIGHTS

Supplier must:

Not engage in, or through business partners be complicit in, any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour, including state-imposed forced labour.

Ensure that working hours comply with national laws and benchmark industry standards, and not more than prevailing international standards.

Ensure that wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher.

Recognize and respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, in accordance with the laws of the countries in which they are employed.

Ensure that young persons do not work at night and that they are protected against conditions of work which are prejudicial to their health, safety, morals, and development, without prejudice to the specific expectations set out in this principle.

Not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, caste, gender, marital or parental status, age, national or social origin, membership of traditional marginalized groups, religion, sexual orientation, pregnancy, disability, union membership, political affiliation, serious illness or any other condition that could give rise to discrimination, as established by applicable law or by ILO Conventions 100 and 111, as well as by the UN Convention on the Elimination of All Forms of Discrimination against Women.

## REQUIREMENTS CONCERNING BUSINESS ETHICS

Supplier must:

Be aware that corruption in any form is not accepted, including – but not limited to – bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

## REQUIREMENTS CONCERNING ENVIRONMENT

Supplier must:

Comply with national environmental legislation or with international standards where national legislation is weak or poorly enforced.

Adopt an environmental policy as well as processes to manage environmental aspects and reduce or minimize negative environmental impacts.

Work to continuously reduce their energy use and greenhouse gas emissions.

## REQUIREMENTS CONCERNING CHEMICALS IN PRODUCTS AND PRODUCTION

Supplier must:

Ensure, that all the requirements in the REACH Regulations shall be fulfilled in production and in final products.

## REQUIREMENTS CONCERNING PRODUCT SAFETY

Supplier must:

Ensure that products meet agreed and legal standards for health and safety, and that products are properly labelled and have instructions for safe use.

## IN THE EVENT OF A BREACH OF THE CODE OF CONDUCT

In the event of a breach of the Code of Conduct, Niemen Tehtaat Oy and the supplier will jointly prepare a plan for remedying the breach. If the supplier remains unwilling to remedy the breach following repeated enquiries, Niemen Tehtaat Oy reserves the right to terminate the business relation with the supplier.